

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA**

**IN RE: GARDASIL PRODUCTS
LIABILITY LITIGATION**

MDL No. 3036

**THIS DOCUMENT RELATES TO ALL
CASES**

Civil Action No. 3:22-md-03036-RJC

PLAINTIFFS' MOTION TO COMPEL

The MDL Plaintiffs, by and through counsel and pursuant to Federal Rules of Civil Procedure 26, 33, 34, and 37, respectfully move this Honorable Court to enter an order compelling Defendants MERCK & CO., INC., and MERCK SHARP & DOHME LLC. (collectively "Merck") to: (1) produce documents and further responses for Requests for Production of Documents Nos. 3–4, 10, 18–19, 32, 45–49, 55–56, 60–65 & 71–74; (2) provide further responses to Interrogatory Nos. 36, 78–80 & 86–87; and (3) grant such other fair and just relief that is warranted under the circumstances.

Plaintiffs have met and conferred with Merck regarding these discovery requests, and the Parties remain at an impasse.

In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law and exhibits.

Dated: November 18, 2022

Respectfully submitted,

/s/ Bijan Esfandiari

Bijan Esfandiari (SBN: 223216)

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Plaintiffs' Liaison Counsel

CERTIFICATE OF SERVICE

I, Bijan Esfandiari, hereby certify that the foregoing document was filed on the date indicated below using the Court's ECF system, which will provide notice of this filing to all counsel of record.

This, the 18th day of November 2022.

/s/ *Bijan Esfandiari*
Bijan Esfandiari